

THE HON. RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

JANE DOE, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

MICROSOFT CORPORATION, a  
Washington Corporation; QUALTRICS  
INTERNATIONAL INC., a Delaware  
Corporation; and QUALTRICS LLC, a  
Delaware Limited Liability Company,

Defendants.

Case No. 2:23-cv-00718-RSM

**STIPULATED MOTION AND ORDER TO  
AMEND CASE SCHEDULE**

NOTE ON MOTION CALENDAR: December 9,  
2024

**STIPULATED MOTION**

Pursuant to Local Civil Rule 10(g), the parties hereby jointly stipulate to continue the dates set forth in the Court's Minute Order dated April 2, 2024 (Dkt. #82) ("Minute Order"). The Court's Minute Order set certain class certification-related deadlines, as noted below, with the "remaining dates, including a discovery cutoff, [to be set] after its ruling on Plaintiff's motion for class certification." Dkt. #82. The discovery in this matter, which the parties have diligently pursued thus far, is highly technical and has required additional time by the parties to investigate the allegations and to confer and carry out the agreed upon search, collection, and production of relevant information. Additionally, the parties have served, and anticipate additional necessary, third-party

STIPULATED MOTION AND ORDER  
TO AMEND CASE SCHEDULE - 1  
Case No. 2:23-cv-00718-JCC

SUMMIT LAW GROUP, PLLC  
315 FIFTH AVENUE SOUTH, SUITE 1000  
SEATTLE, WASHINGTON 98104-2682  
Telephone: (206) 676-7000  
Fax: (206) 676-7001

discovery. In light of the extensive and technical fact and expert discovery necessary given the subject matter of this action, and in order to preserve judicial resources, the parties believe good cause exists to extend the deadlines set forth in the Minute Order and respectfully request that the Court enter a new scheduling order that adopts the parties' jointly proposed schedule set forth below.

Case Event	Current Deadline	Proposed Deadline
Deadline for parties to serve expert report(s) relevant for class certification	02/28/2025	07/28/2025
Deadline for any rebuttal expert report(s) relevant for class certification	03/20/2025	08/20/2025
Deadline for joinder of additional parties and to amend pleadings	03/26/2025	08/26/2025
Deadline to file/serve Plaintiff's motion for class certification	05/09/2025	10/09/2025
Deadline for Defendants' response to be filed/served to Plaintiff's motion for class certification	06/27/2025	11/26/2025
Deadline for Plaintiff's reply in support of class certification	07/19/2025	12/19/2025

I certify that this memorandum contains 263 words, in compliance with the Local Civil Rules.

DATED this 9<sup>th</sup> day of December 2024. SUMMIT LAW GROUP, PLLC

By s/ Alexander A. Baehr

Alexander A. Baehr, WSBA No. 25320  
Molly J. Gibbons, WSBA No. 58357  
315 Fifth Avenue S., Suite 1000  
Seattle, WA 98104  
Telephone: (206) 676-7000  
Email: [alexb@summitlaw.com](mailto:alexb@summitlaw.com)  
[mollyg@summitlaw.com](mailto:mollyg@summitlaw.com)

STIPULATED MOTION AND ORDER  
TO AMEND CASE SCHEDULE - 2  
Case No. 2:23-cv-00718-JCC

SUMMIT LAW GROUP, PLLC  
315 FIFTH AVENUE SOUTH, SUITE 1000  
SEATTLE, WASHINGTON 98104-2682  
Telephone: (206) 676-7000  
Fax: (206) 676-7001

BIRD, MARELLA, BOXER, WOLPERT,  
NESSIM, DROOKS, LINCENBERG, RHOW PC

Ekwan E. Rhaw (*Admitted pro hac vice*)  
Marc E. Masters (*Admitted pro hac vice*)  
Barr Benyamin (*Admitted pro hac vice*)  
1875 Century Park East, 23rd Floor  
Los Angeles, California 90067  
Telephone: (310) 201-2100  
Email: [erhow@birdmarella.com](mailto:erhow@birdmarella.com)  
[mmasters@birdmarella.com](mailto:mmasters@birdmarella.com)  
[bbenyamin@birdmarella.com](mailto:bbenyamin@birdmarella.com)

GLANCY PRONGAY & MURRAY LLP  
Jonathan M. Rotter (*Admitted pro hac vice*)  
Kara M. Wolke (*Admitted pro hac vice*)  
Pavithra Rajesh (*Admitted pro hac vice*)  
Holly K. Nye (*Admitted pro hac vice*)  
1925 Century Park East, Suite 2100  
Los Angeles, California 90067  
Telephone: (310) 201-9150  
Email: [jrotter@glancylaw.com](mailto:jrotter@glancylaw.com)  
[kwolke@glancylaw.com](mailto:kwolke@glancylaw.com)  
[prajesh@glancylaw.com](mailto:prajesh@glancylaw.com)  
[hnye@glancylaw.com](mailto:hnye@glancylaw.com)

*Attorneys for Plaintiff*

WILSON SONSINI GOODRICH &  
ROSATI, P.C.

*By s/ Gregory L. Watts (with email permission)*

Gregory L. Watts, WSBA #43995  
Tyre L. Tindall, WSBA #56357  
701 Fifth Avenue, Suite 5100  
Seattle, WA 98104-7036  
Email: [gwatts@wsgr.com](mailto:gwatts@wsgr.com)  
[ttindall@wsgr.com](mailto:ttindall@wsgr.com)

Victor Jih (*Admitted pro hac vice*)  
1900 Avenue of the Stars, 28th Floor  
Los Angeles, CA 90067  
Email: [vjih@wsgr.com](mailto:vjih@wsgr.com)

*Attorneys for Defendants Qualtrics International  
Inc. and Qualtrics, LLC*

1 MORGAN, LEWIS & BOCKIUS LLP

2 By s/ Phillip J. Wiese (with email permission)

3 Ezra D. Church (Admitted *pro hac vice*)

4 2222 Market Street

5 Philadelphia, PA 19103

6 Email: [ezra.church@morganlewis.com](mailto:ezra.church@morganlewis.com)

7 Phillip J. Wiese (Admitted *pro hac vice*)

8 One Market, Spear Street Tower

9 San Francisco, CA 94105

10 Email: [phillip.wiese@morganlewis.com](mailto:phillip.wiese@morganlewis.com)

11 DAVIS WRIGHT TREMAINE LLP

12 By s/ Fred Burnside (with email permission)

13 Fred Burnside, WSBA #32491

14 Xiang Li, WSBA #52306

15 920 Fifth Avenue, Suite 3300

16 Seattle, WA 98104-1610

17 Phone: (206) 622-3150

18 E-mail: [fredburnside@dwt.com](mailto:fredburnside@dwt.com)

19 [xiangli@dwt.com](mailto:xiangli@dwt.com)

20 *Attorneys for Defendant Microsoft Corporation*

**ORDER**

IT IS SO ORDERED. The Clerk is DIRECTED to enter a new scheduling order in accordance with the deadlines listed below. The Court will set the remaining dates, including a discovery cutoff, after its ruling on Plaintiff's motion for class certification.

Case Event	New Deadline
Deadline for parties to serve expert report(s) relevant for class certification	07/28/2025
Deadline for any rebuttal expert report(s) relevant for class certification	08/20/2025
Deadline for joinder of additional parties and to amend pleadings	08/26/2025
Deadline to file/serve Plaintiff's motion for class certification	10/09/2025
Deadline for Defendants' response to be filed/served to Plaintiff's motion for class certification	11/26/2025
Deadline for Plaintiff's reply in support of class certification	12/19/2025

DATED this 13<sup>th</sup> day of December, 2024.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE

1 Presented by:

2 SUMMIT LAW GROUP, PLLC  
3 *Attorneys for Plaintiff*

4 By s/ Alexander A. Baehr

5 Alexander A. Baehr, WSBA No. 25320  
6 Molly J. Gibbons, WSBA No. 58357  
7 315 Fifth Avenue S., Suite 1000  
8 Seattle, WA 98104  
9 Email: [alexb@summitlaw.com](mailto:alexb@summitlaw.com)  
10 [mollyg@summitlaw.com](mailto:mollyg@summitlaw.com)

11 WILSON SONSINI GOODRICH & ROSATI, P.C.

12 *Attorneys for Defendants Qualtrics International Inc. and Qualtrics, LLC*

13 By s/ Gregory L. Watts (with email permission)

14 Gregory L. Watts, WSBA #43995  
15 Tyre L. Tindall, WSBA #56357  
16 701 Fifth Avenue, Suite 5100  
17 Seattle, WA 98104-7036  
18 Email: [gwatts@wsgr.com](mailto:gwatts@wsgr.com)  
19 [ttindall@wsgr.com](mailto:ttindall@wsgr.com)

20 MORGAN, LEWIS & BOCKIUS LLP

21 *Attorneys for Defendant Microsoft Corporation*

22 By s/ Phillip J. Wiese (with email permission)

23 Ezra D. Church (Admitted pro hac vice)  
24 2222 Market Street  
25 Philadelphia, PA 19103  
26 Email: [ezra.church@morganlewis.com](mailto:ezra.church@morganlewis.com)

Phillip J. Wiese (Admitted pro hac vice)  
One Market, Spear Street Tower  
San Francisco, CA 94105  
Email: [phillip.wiese@morganlewis.com](mailto:phillip.wiese@morganlewis.com)

1 DAVIS WRIGHT TREMAINE LLP  
2 *Attorneys for Defendant Microsoft Corporation*

3 By s/ Fred Burnside (with email permission)

4 Fred Burnside, WSBA #32491

5 Xiang Li, WSBA #52306

6 920 Fifth Avenue, Suite 3300

7 Seattle, WA 98104-1610

8 E-mail: [fredburnside@dwt.com](mailto:fredburnside@dwt.com)

9 [xiangli@dwt.com](mailto:xiangli@dwt.com)

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
STIPULATED MOTION AND ORDER  
TO AMEND CASE SCHEDULE - 7  
Case No. 2:23-cv-00718-JCC

SUMMIT LAW GROUP, PLLC  
315 FIFTH AVENUE SOUTH, SUITE 1000  
SEATTLE, WASHINGTON 98104-2682  
Telephone: (206) 676-7000  
Fax: (206) 676-7001